

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CANDY M. SOUSA, on behalf of herself)
and all others similarly situated,)

Plaintiff,)

v.)

Civil Action No. 3:04-CV-30022 (MAP)

WAVE SYSTEMS CORPORATION,)
JOHN E. BAGALAY, JR., STEVEN K.)
SPRAGUE, and GERARD T. FEENEY,)

Defendants.)

YOSEF STREICHER, on behalf of himself)
and all others similarly situated,)

Plaintiff,)

v.)

Civil Action No. 3:04-CV-30026 (MAP)

WAVE SYSTEMS CORPORATION,)
JOHN E. BAGALAY, JR., STEVEN K.)
SPRAGUE, and GERARD T. FEENEY,)

Defendants.)

[Captions continued on next page]

**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO FILE REPLY BRIEFS IN
SUPPORT OF RESPECTIVE MOTIONS FOR APPOINTMENT OF LEAD PLAINTIFFS
AND FOR APPROVAL OF SELECTION OF LEAD AND LIAISON COUNSEL**

RAFAT DAWOD, individually and on)
behalf of all others similarly situated,)

Plaintiff,)

v.)

WAVE SYSTEMS CORPORATION,)
STEVEN K. SPRAGUE, and GERARD T.)
FEENEY,)

Defendants.)

Civil Action No. 3:04-CV-30029 (MAP)

ALVIN CHESS, individually and on behalf)
all others similarly situated,)

Plaintiff,)

v.)

WAVE SYSTEMS CORPORATION,)
STEVEN K. SPRAGUE, and GERARD T.)
FEENEY,)

Defendants.)

Civil Action No. 3:04-CV-30037 (MAP)

MICHAEL VICKER, on behalf of himself)
and all others similarly situated,)

Plaintiff,)

v.)

WAVE SYSTEMS CORPORATION,)
JOHN E. BAGALAY, JR., STEVEN K.)
SPRAGUE, and GERARD T. FEENEY,)

Defendants.)

Civil Action No. 3:04-CV-30040 (MAP)

[Captions continued on next page]

H. MARTIN BOHMAN, individually and)
on behalf of all others similarly situated,)

Plaintiff,)

v.)

Civil Action No. 3:04-CV-30041 (MAP)

WAVE SYSTEMS CORPORATION,)
STEVEN K. SPRAGUE, and GERARD T.)
FEENEY,)

Defendants.)

JIMMY SUO, on behalf of himself and all)
others similarly situated,)

Plaintiff,)

v.)

Civil Action No. 3:04-CV-30042 (MAP)

WAVE SYSTEMS CORPORATION,)
STEVEN K. SPRAGUE, and GERARD T.)
FEENEY,)

Defendants.)

JACK SCHULMAN, individually and on)
behalf of all others similarly situated,)

Plaintiff,)

v.)

Civil Action No. 3:04-CV-30043 (MAP)

WAVE SYSTEMS CORPORATION,)
STEVEN K. SPRAGUE, and GERARD T.)
FEENEY,)

Defendants.)

Pursuant to Local Rule 7.1(B)(3), Plaintiffs by and through their undersigned counsel of record, respectfully move for leave of court to file reply memoranda in further support of certain pending competing Motions For Appointment of Lead Plaintiffs and For Approval of Selection of Lead and Liaison Counsel (“Lead Plaintiff Motions”).

In support of this Motion, lead plaintiff movants (i) Ron Rogers and Steve Alvarez, and (ii) Anne Brumbaugh, Gary L. Harmon and Randi K. Griffin (the “Brumbaugh Group”), contend that a reply memorandum from each of them is necessary to address the arguments and assertions in their respective moving papers and opposition memoranda. The reply memoranda for each of these lead plaintiff movants are to be filed by Wednesday, April 28, 2004. No other lead plaintiff movants take any position as to this Motion.

In further support, Plaintiffs note that Defendants have stated that they will not oppose this Motion.

WHEREFORE, Plaintiffs Ron Rogers and Steve Alvarez, and the Brumbaugh Group, respectfully request leave of Court to file reply memorandum in support of their respective Lead Plaintiff Motions.

CERTIFICATION UNDER LOCAL RULE 7.1(A)(2)

Undersigned counsel hereby certify that they conferred with counsel for Defendants in a good faith effort to resolve or narrow the issues raised by this Motion and that Defendants’ counsel has indicated that Defendants will not oppose this Motion.

Dated: April 22, 2004

Respectfully submitted,

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**Counsel for Plaintiffs Ron Rogers and
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